

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**KERRIE CAMPBELL and
JAROSLAWA Z. JOHNSON,
individually, and on behalf of others
similarly situated,**

Plaintiffs,

v.

Civ. No. 1:16-cv-06832 (JPO)

**CHADBOURNE & PARKE LLP,
MARC ALPERT, ANDREW GIACCIA,
ABBE LOWELL, LAWRENCE
ROSENBERG, HOWARD SEIFE, and
PAUL WEBER**

Defendants.

**NOTICE OF PLAINTIFF KERRIE CAMPBELL'S MOTION TO DISMISS
COUNTERCLAIM AND FOR RELATED RELIEF**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiff Kerrie Campbell's Motion to Dismiss Counterclaim and for Related Relief and all prior pleadings and proceedings had herein, Plaintiff Kerrie Campbell, by and through her undersigned attorneys, will respectfully move this Court, before the Honorable J. Paul Oetken, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, Courtroom 706, at such time and place as the Court may direct, for an Order dismissing Defendant's Counterclaim against Plaintiff Campbell with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, granting Plaintiff Campbell leave to amend her complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, and for any other relief the Court deems appropriate.

Dated: New York, New York
December 16, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David W. Sanford", written over a horizontal line.

David W. Sanford (admitted *pro hac vice*)

Jeremy Heisler (JH-0145)

Andrew Melzer (AM-7649)

Alexandra Harwin (AH-3111)

Saba Bireda (admitted *pro hac vice*)

Kevin Love Hubbard (admitted *pro hac vice*)

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